

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LBB CORPORATION d/b/a SPUNK VIDEO,

Plaintiff,

v.

LUCAS DISTRIBUTION, INC.; LUCAS
ENTERTAINMENT, INC.; LUCAS PRODUCTIONS,
INC.; and ANDREI TREIVAS BREGMAN p/k/a
MICHAEL LUCAS;

Defendants.

)
) Civil Action No.:
) **08-CV-04320 (SAS)**
)

) **NOTICE OF MOTION FOR**
) **TEMPORARY RESTRAINING**
) **ORDER, PRELIMINARY**
) **INJUNCTION AND**
) **EXPEDITED DISCOVERY**
)
)

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law dated July 18, 2008, the sworn Declaration of Roman Senko, dated June 16, 2008, the sworn Declaration of Casey Dworkin, dated July 3, 2008, and upon all the proceedings heretofore had herein, Plaintiff LBB CORPORATION d/b/a SPUNK VIDEO (hereinafter "LBB"), by its attorney R. Brent English, Esq., will move this Court before the Honorable Shira A. Scheindlin, United States District Judge, in Courtroom 15C at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007:

- (1) for an order, pursuant to Federal Rule of Civil Procedure 65(a) and 17 U.S.C. § 502, imposing a preliminary injunction against Defendants LUCAS DISTRIBUTION, INC.; LUCAS ENTERTAINMENT, INC.; LUCAS PRODUCTIONS, INC.; and ANDREI TREIVAS BREGMAN p/k/a MICHAEL LUCAS (hereinafter "the Lucas Defendants") from further copyright infringement;
- (2) for an order, pursuant to Federal Rule of Civil Procedure 65(b) and 17 U.S.C. § 502, temporarily restraining the Lucas Defendants from further infringing activities;

(3) for an order, pursuant to Federal Rule of Civil Procedure § 26(d), granting LBB expedited discovery; and

(4) For such other and further relief as this Court may deem just and proper.

The undersigned certifies that prior to making this motion, the movant used his best efforts to resolve informally the matters raised in this motion including the exchange letters.

Dated: New York, New York
July 18, 2008

Respectfully submitted,

R. Brent English, Esq., Attorney at Law
Attorney for Plaintiff
LBB CORPORATION d/b/a SPUNK VIDEO

By: 
R. Brent English (RBE - 3575)

225 Broadway, Suite 612
New York, New York 10007
Tele : (212) 962-3195
Fax : (646) 390-8021
E-mail : rbenglish_esq@att.net

To: Mason Weisz, Esq.
Toby M.J. Butterfield, Esq.
Cowan, DeBaets, Abrahams & Sheppard LLP
Attorneys for Defendants
41 Madison Avenue, 34th Floor
New York, New York 10010
Tele : (212) 974-7474
Fax : (212) 974-8474
E-mail : mweisz@cdas.com; tbutterfield@cdas.com